

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KATHERINE YOST,

Plaintiff,

v.

EVERYREALM INC., COMPOUND ASSET
MANAGEMENT LLC, REALM METAVERSE REAL
ESTATE INC., REPUBLIC, REPUBLIC CRYPTO
LLC, REPUBLIC REALM MANAGER LLC,
REPUBLIC REALM INC., REPUBLIC
OPERATIONS LLC, OPENDEAL INC., OPENDEAL
PORTAL LLC, JANINE YORIO, in her individual and
professional capacities, WILLIAM KERR, in his
individual and professional capacities, and ZACH
HUNGATE, in his individual and professional
capacities,

Defendants.

Index No.: 1:22-cv-06549(PAE)(SLC)

**DECLARATION OF
KATHERINE YOST**

Katherine Yost, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I served as the HR Director and as an independent contractor for certain Defendants and their related entities (“Defendants”) and am a resident of the state of Maryland. I submit this declaration based upon my personal knowledge in support of the Opposition to the Motion to Compel Arbitration on behalf of myself in the above-captioned matter.
2. I did not voluntarily resign my position with Defendants.
3. I am afraid that I will be blacklisted as a result of this lawsuit.

4. Mr. Seppinni has informed me that reporters wish to ask me questions regarding my pending claims, and I have declined to do so.

5. As a result of the stress from the discrimination and sexual harassment I faced at the hands of defendants, I have developed a skin peeling disorder that has worsened and causes my hands to bleed and feel immense pain.

6. I remain unemployed.

7. I have been unable to purchase my necessary medications due to my termination, including a \$233 prescription to treat my ADHD.

8. I therefore go on without necessary medicine.

9. The family car that I own broke down this week and has left my kids stranded since I am unable to afford to have it repaired.

10. I want justice.

11. Defendants' threats to sue me scared me and I took them seriously.

12. I did my best to determine if the Employment Agreement required me to arbitrate my claims.

13. With the help of my lawyer, I determined that the Agreement only applies to contract claims.

14. None of my claims are for breach of contract.

15. I noticed that the arbitration provision does not include the words "employment related disputes."

16. I determined that I could not afford to pay the fees I would have owed under the Agreement to the American Arbitration Association.

17. The AAA fees would likely have bankrupted me.

18. Because of my unemployment status, I have had to take on thousands of dollars in debt to support my family and I currently have \$0 in cash available.

19. I initially wanted to file in arbitration but determined I could not afford to.

20. Now that I have already filed publicly, it is my wish to proceed with my claims to trial.

21. I have been made aware that Janine Yorio contacted a third-party professional investor in an attempt to have this person attempt to encourage me to drop my claims.

22. I have been made aware that the third party investor declined to do so.

23. I felt I had no choice but to file in court.

Pursuant to 28 U.S.C. 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: September 2, 2022

A handwritten signature in black ink, appearing to be 'Jup' followed by a horizontal line.